UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

DENNIS GROMOV, individually and on behalf of all others similarly situated,

Case No. 1:22-cv-6918

Plaintiff,

Judge Valderrama

BELKIN INTERNATIONAL, INC.,

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Magistrate Judge Fuentes

Defendant.

GROMOV'S STATUS REPORT

Gromov would like to provides the Court with a status report on discovery.

In the past few weeks, the parties have conferred and made strong progress on a stipulation that would govern further depositions in this action and in the California state case, *Miley v*.

Belkin. This process took some time on each side. The parties will be submitting the final stipulation in the next few days.

Because of these negotiations, the parties agreed to defer taking those depositions. Thus, although today is the close of fact discovery under the Court's scheduling order, Gromov has not yet been able to take the depositions. Today, Belkin offered a new date (August 1) for one witness and is working on finding a date for the other.

Accordingly, the parties also have a written agreement to return to this Court with a joint motion requesting the Court to extend the deadlines for the close of fact discovery and other dates following it. Gromov would expect that to be filed in the next few days also, after Belkin and Gromov confer and agree on the deposition dates.

Respectfully submitted,

Date: July 18, 2024 /s/ William F. Cash III

William F. Cash III (Ill. Bar No. 6330856)

bcash@levinlaw.com

Matthew D. Schultz (pro hac vice)

mschultz@levinlaw.com

LEVIN, PAPANTONIO, RAFFERTY, PROCTOR, BUCHANAN, O'BRIEN, BARR & MOUGEY, P.A.

316 South Baylen Street, Suite 600

Pensacola, FL 32502 Phone: 850-435-7059

Seyed Abbas Kazerounian (Ill. Bar No. 6316129)

ak@kazlg.com

KAZEROUNI LAW GROUP, APC

245 Fischer Avenue, Unit D1

Costa Mesa, CA 92626

Phone: 800-400-6808

Jason A. Ibey (Bar. No. 16691)

iason@kazlg.com

KAZEROUNI LAW GROUP, APC

321 N. Mall Drive, Suite R108

St. George, Utah 84790

Phone: 800-400-6808

D. Greg Blankinship (pro hac vice) gblankinship@fbfglaw.com

Bradley F. Silverman (pro hac vice)

bsilverman@fbfglaw.com

FINKELSTEIN, BLANKINSHIP,

FREI-PEARSON & GARBER, LLP

1 North Broadway, Suite 900

White Plains, NY 10601

Phone: 914-298-3290

Attorneys for Plaintiff Dennis Gromov